

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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PETER ST. LAURENT, ) U.S. DISTRICT COURT  
Plaintiff ) DISTRICT OF MASS.  
v. ) CIVIL ACTION NO. 04-CV-11951-FDS  
UNITED PARCEL SERVICE, )  
Defendant )

**STATEMENT OF PETER ST. LAURENT IN PREPARATION FOR STATUS  
CONFERENCE**

Pursuant to the Scheduling Order issued on November 4, 2004 in the above captioned case, Peter St. Laurent submits the following statement in preparation for the February 17, 2005 status conference:

**1. Status of the Case**

Discovery is almost complete. Peter St. Laurent served interrogatories and document requests on December 15, 2004 and received United Parcel Services' ("UPS") responses on February 10, 2005. On February 2, 2005, UPS noticed Mr. St. Laurent's deposition. On that day, Mr. St. Laurent's counsel verbally informed UPS' counsel that there would be an objection to producing Mr. St. Laurent for deposition, as UPS already deposed Mr. St. Laurent on November 4, 2002, while this matter was at the Massachusetts Commission Against Discrimination.

**2. Schedule for the Remainder of the Case through Trial**

Upon more thorough review of UPS' response to Mr. St. Laurent's initial discovery requests, which were received less than one week ago, Mr. St. Laurent may request a one month extension of the discovery period to conduct depositions. Mr. St. Laurent agrees with UPS' proposed schedule:

|   |                    |
|---|--------------------|
| 1. Plaintiff's Initial Disclosure Served:                   | March 1, 2005      |
| 2. Completion of written discovery and fact depositions by: | April 1, 2005      |
| 3. All Despositive Motions filed:                           | June 1, 2005       |
| 4. Plaintiff's designation of expert witnesses:             | August 1, 2005     |
| 5. Defendant's designation of expert witnesses:             | September 15, 2005 |
| 6. Expert depositions by:                                   | October 31, 2005   |
| 7. Final Pre-Trial Conference by:                           | December 1, 2005   |

**3. Alternative Dispute Resolution**

The Plaintiff is amendable to submitting this matter to mediation.

**4. Consent to trial before the Magistrate Judge**

Peter St. Laurent will consent to trial before Magistrate Judge Dein.

Respectfully submitted,

The plaintiff,  
By his Attorneys,

KECHES & MALLEN, P.C.

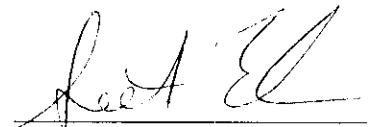


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SETH J. ELIN  
BBO # 636099  
122 Dean Street  
Taunton, MA 02780  
(508) 822-2000

DATED: February 16, 2005

**CERTIFICATE OF SERVICE**

I, Seth J. Elin, Esquire, attorney for the Employee, hereby certify that a copy of the foregoing was served, by hand, upon all attorneys of record.



Seth J. Elin  
KECHES & MALLEN, P.C.  
122 Dean Street  
Taunton, MA 02780  
(508) 822-2000

Dated: February 16, 2005